

MJL:BTR
F.#2005R00022
OCDETF-NYE476

JUDGE KEENAN

U.S. DISTRICT COURT, E.D.N.Y.
IN CLERK'S OFFICE
LONG ISLAND COURTHOUSE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

07 CRM 927

----- X

UNITED STATES OF AMERICA

- against -

VINCENT SAPORITO,
PASQUALE J. ANDRIANO,
ANGELO S. RUGGIERO,
• JOHN ANDRIANO,
• DANIEL BOWLES,
• RICHARD SCHWERDT, and
• HENRY NAVARRA,

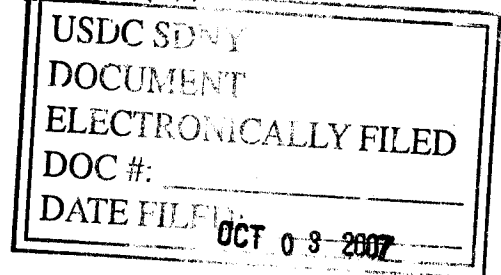
Defendants.

----- X

THE GRAND JURY CHARGES:

SUPERSEDING
INDICTMENT

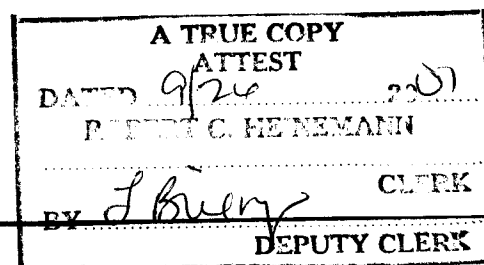
Cr. No. 05-196(S-8)(SJF)
(T. 18, U.S.C., §§
982(a)(1), 982(b)(1),
1956(h) and 3551 et seq.;
T. 21, U.S.C., §§
841(b)(1)(A)(vii),
846, 853 and ~~860(a)~~)



COUNT ONE

(Conspiracy to Distribute and Possess
with the Intent to Distribute Marijuana)

1. In or about and between January 1997 and March 3, 2005, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VINCENT SAPORITO, PASQUALE J. ANDRIANO, ANGELO S. RUGGIERO, JOHN ANDRIANO, DANIEL BOWLES, RICHARD SCHWERDT, and HENRY NAVARRA, together with others, did knowingly and intentionally conspire (a) to distribute and to possess with intent to distribute a controlled substance, which offense involved one thousand or more marijuana plants and one thousand kilograms or more of a substance containing marijuana, a Schedule I controlled



substance, and (b) to distribute and to possess with intent to distribute such controlled substance within 1,000 feet of the real property comprising an elementary school, to wit: P.S. 109, 1001 East 45th Street, Brooklyn, New York and Saint Robert Bellarmine School, 56-10 214th Street, Bayside, New York, in violation of Title 21, United States Code, Sections 841(a)(1) and 860(a).

(Title 21, United States Code, Sections 846, 841(b)(1)(A)(vii) and 860(a); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO
(Conspiracy to Launder Money)

2. On or about and between January 1, 1997 and March 3, 2005, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VINCENT SAPORITO, PASQUALE J. ANDRIANO, ANGELO S. RUGGIERO, JOHN ANDRIANO, DANIEL BOWLES, RICHARD SCHWERDT, and HENRY NAVARRA, together with others, did knowingly and intentionally conspire to conduct financial transactions affecting interstate commerce, which in fact involved the proceeds of specified unlawful activity, to wit: marijuana trafficking, in violation of Title 21, United States Code, Section 841(a), knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity (a) with the intent to promote the carrying on of the specified unlawful activity, in violation

of Title 18, United States Code, Section 1956(a)(1)(A)(i) and (b) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i)

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT ONE

3. The United States hereby gives notice to the defendants charged in Count One that, upon their conviction of such offense, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853, which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense, including but not limited to, a sum of money equal to \$12,000,000.00 in United States currency, for which the defendants are jointly and severally liable.

4. If any of the above-described forfeitable property, as a result of any act or omission of any defendant,

a. cannot be located upon the exercise of due

diligence;

b. has been transferred or sold to, or deposited with,
a third party;

c. has been placed beyond the jurisdiction of the
Court;

d. has been substantially diminished in value; or

e. has been commingled with other property, which
cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21,
United States Code, Section 853(p), to seek forfeiture of any
other property of the defendants, including, but not limited to,
the real property and premises located at 12557 Equine Lane,
Wellington, Florida 33414-3507, up to the value of the
forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Section 853)

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT TWO

5. The United States hereby gives notice to the
defendants charged in Count Two that, upon their conviction of
such offense, the government will seek forfeiture in accordance
with Title 18, United States Code, Section 982(a)(1), of all
property involved in the conspiracy to violate Title 18, United
States Code, Section 1956, and all property traceable to such
property as a result of the defendants' conviction of Count Two,
including but not limited to, a sum of money equal to
\$12,000,000.00 in United States currency, for which the

defendants are jointly and severally liable.

6. If any of the above-described forfeitable property, as a result of any act or omission of any defendant:

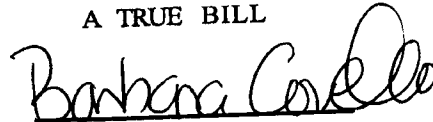
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property, which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any

other property of the defendants up to the value of the
forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(1) and
982(b)(1))

A TRUE BILL


FOREPERSON

ROSLYNN R. MAUSKOPF
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 

ACTING UNITED STATES ATTORNEY

PURSUANT TO 28 U.S.C. § 531

NEY

